

AFFIDAVIT

I, Steve Cook, being duly sworn, state under oath that:

1. I am a Detective with the Independence Missouri Police Department (IPD), and I am currently assigned to the GUN Squad under the Independence Police Department Criminal Investigations Bureau and assigned as a Task Force Officer (TFO) with the Bureau of Alcohol, Tobacco, Firearms and Explosives. I have been employed with the Independence Missouri Police Department since 1993 and have 26 years of Criminal Investigations Experience with assignments at the Jackson County Drug Task Force (JCCTF), Drug Enforcement Administration (DEA) on the Clandestine Laboratory Enforcement Team, and Federal Bureau of Investigation (FBI) Violent Crime Gang Task Force. In connection with my official duties, I have investigated criminal violations of Titles 18 and 21 of the United States Code. Based upon my investigation, I believe the following to be true and correct:
2. This Affidavit contains information necessary to support probable cause for this application. It is not intended to include every fact or matter observed by me or known by law enforcement. The information provided is from my participation in this investigation as well as from reviewing investigative reports, physical evidence obtained during the investigation, my review of records and documents, from discussions with others, including law enforcement officers, and from my personal knowledge, training, and experience.
3. On October 6, 2022 at approximately 1431 hours, Officers with the Independence Missouri Police Department were dispatched to 11100 E. US 40 Highway, Liquor Land, in Independence, Missouri, on a reported shooting.
4. Upon arrival officers located a subject later identified as Anthony Santi on the floor of the business directly inside the front doors with an apparent gunshot wound. Santi was transported to Centerpoint Medical Center. Lifesaving measures were unsuccessful and Santi died as a result of the injuries sustained from the gunshot.
5. I responded to the scene along with other Detectives and I conducted an interview with the store manager, Umer Qureshi. He advised that a black male subject had entered the store wanting to buy cigars. Qureshi advised that they did not have the kind of cigars that the subject wanted and as a result the subject was disrespectful to his female clerk and was cussing at her. Qureshi advised that his clerk refused service to the subject and he was asked to leave. Qureshi advised that the subject refused to leave the business.
6. Qureshi advised that Santi was at the business delivering novelty items for the business to sell. Qureshi advised that Santi told the subject to leave and that the subject jumped away from Santi and then began threatening Santi. Qureshi advised that Santi and the subject exited the business and that Qureshi observed that the subject had a gun and that Santi tried to wrestle the gun away from the subject and that bullets fell out of the gun

during that time. Qureshi advised that he then saw that the gun was in a black females hand that had gotten out of the vehicle the male subject arrived in and that Qureshi then heard a shot.

7. I viewed store surveillance video and observed the black male subject in the business acting very agitated and animated towards the female working behind the counter. On the outside surveillance I observed the subject at the drivers door of a white 4-door SUV. Santi approaches the subject, and you see the subject reach into the vehicle and then come out and go after Santi. You can see both subjects fighting over an item that the subject is holding. The female passenger gets out of the vehicle during this time. Santi and the subject go to the ground, and you can clearly see a firearm in the black male's hand with an extended magazine. Santi continues to struggle with the subject on the ground while the female attempts to pull Santi off of the subject. At one point the female is striking Santi who has managed to get the subject in a headlock. The female subject gets the gun from the male subject and is pointing it at Santi and eventually fires one round at Santi, appearing to strike him in the back. Santi lets go of the subject and gets up and walks into the business where he collapses. The male and female get back into the vehicle and flee the scene.
8. In the parking lot and on the sidewalk outside the front doors of the business I observed pieces of a magazine and several live rounds of S&B 40 S&W ammunition. I also observed one spent shell casing.
9. While on scene the mother of the female shooting suspect arrived with her daughter. Her daughter was taken into custody at that time and was identified as Angel Graham. It was also learned at that time that the male suspect was in a gold Saturn across the street from the business at the Quik Trip. Officers responded and took him into custody, and he was identified as Ja'Von Taylor.
10. A criminal history check of Taylor revealed that he was a convicted felon out of Missouri for Robbery 1st degree.
11. The vehicle that Taylor and Graham had been in at the time of the incident was located in the driveway at Graham's mother's residence at 8336 Wayne Avenue, KCMO. A search warrant was obtained for the vehicle, a white Chevy Equinox, and Detectives located a blue backpack on the passenger floorboard that contained a Glock 22 .40 caliber bearing serial number BPAE374. A broken extended magazine was located with the firearm along with a 15 round magazine that contained S&B 40 S&W and Winchester .40 S&W ammunition.
12. On October 6, 2022 at approximately 1747 hours, Detective Minter and I conducted an interview with Taylor. Prior to the interview taking place Taylor was read his Miranda Rights. Taylor did advise that he understood his rights and signed the Warning of Rights form.

13. During the interview **Taylor** admitted that he smokes marijuana twice a week and has done so for the past year and a half. **Taylor** advised that he is currently on paper for marijuana and that he also has a conviction for robbery that has a 10-year back-up.
14. **Taylor** admitted to removing the firearm from underneath the front seat of the vehicle during the incident because he felt threatened by Santi. **Taylor** advised that he had passed the gun to Graham during the tussle with Santi. **Taylor** advised that Santi had managed to dump the magazine from the gun during the struggle.
15. **Taylor** advised that he bought the gun from a guy off the street a few months ago for \$500 and that the ammunition came with it. **Taylor** advised that he had a 22 round “clip” with the gun and that he believed the gun was a Glock 23 and that it was a .40 caliber. **Taylor** admitted that a friend of his had taken the gun apart and showed him that it had a “back piece” making it full auto.
16. I did inspect the firearm and observed that it had been modified but that it would need to be test fired on the range in a controlled environment to see if it functions as a machine gun and if so NFA inquiries would have to be made.
17. **Taylor, Ja'Von** is a convicted felon and has the following felony convictions:
 - Case #2016CR0404301, in Jackson County, Missouri, Robbery 1st degree, sentenced to 8 years on March 14, 2022.
18. Special Agent Stephen White with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) was contacted to obtain a verbal confirmation that the Glock 22 .40 caliber semi-automatic handgun, S&B .40 S&W ammunition, and Winchester .40 S&W ammunition, were not manufactured in the State of Missouri, and therefore would have had to travelled in interstate commerce to be recovered in Missouri. Upon review of the firearm and ammunition it was determined that the firearm and ammunition were not manufactured in the State of Missouri, and therefore would have had to travelled in interstate commerce to be recovered in Missouri.

19. The aforementioned events all occurred within the City of Independence, County of Jackson, State of Missouri, which is within the Western District of Missouri. These events give rise to probable cause that this subject is in violation of various federal laws, including, but not limited to, Title 18, United States Code, Sections 922(g)(1) and 924(a)(8), that is, felon in possession of a firearm.

Further, your Affiant sayeth not.

SAC

Task Force Officer Steve Cook
Alcohol, Tobacco, Firearms and Explosives

Telephonically/remotely or otherwise subscribed to and sworn to before me this 7th day of October 2022.

Sworn to by telephone

11:00 AM, Oct 7, 2022

Lajuana M. Counts

Honorable Lajuana M. Counts
United States Magistrate Judge
Western District of Missouri

